

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

ROBERT AKARD,)	Case No. 5:16-CV-02233
)	
Plaintiff,)	
)	Judge Sara Lioi
vs.)	
)	
RODNEY WAYNE ELDRIDGE, <i>et al.</i> ,)	
)	
Defendants.)	

**PLAINTIFF'S PRELIMINARY BUDGET ESTIMATE OF
ANTICIPATED AMOUNT OF ATTORNEYS' FEES AND EXPENSES**

Counsel for Plaintiff, Robert Akard, in compliance with the section of this Court's May 2, 2017 Case Management Conference Scheduling Order (Doc. 49), submits the following preliminary estimate and/or budget of the amount of fees and expenses anticipated to be sought regarding claims in which attorney's fees will be sought:

Attorney's FeesCosts

Preliminary Investigation & Filing of Complaint	\$12,000.00	Depositions	\$ 8,000.00
Procedural Motions Practice	\$12,000.00	Experts	\$ 3,000.00
Discovery	\$25,000.00	Witness Fees	\$ 500.00
Dispositive Motion Practice	\$15,000.00	Other	\$ 1,500.00
Pretrial Court Appearances	\$ 5,000.00		
Pretrial Motions/Instructions	\$ 6,000.00		
Trial	\$30,000.00		
TOTAL FEES	\$129,000.00		\$13,000.00

Respectfully submitted,

/s/ Rachel L. Steinlage

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on May 31, 2017, a true and correct copy of the foregoing *Plaintiff's Preliminary Budget Estimate of Anticipated Amount of Attorneys' Fees and Expenses* was served through the Court's electronic filing system on Daniel J. Funk and Anthony E. Brown, Baker, Dublikar, Beck, Wiley & Mathews, 400 S. Main Street, North Canton, Ohio 44720 at *funk@bakerfirm.com* and *tonyb@bakerfirm.com*, counsel for Defendants Eldridge, Shaw, Blake, Graham, Granzow, Rawles, and Austin; and on Defendant Lori Felgenhauer Caraballo by regular U.S. mail, postage prepaid, at 5421 West Smith Valley Road, Greenwood, IN 46142.

/s/ Rachel L. Steinlage

Rachel L. Steinlage (0079450)